

1 Scott S. Thomas  
2 Nevada Bar No. 7937  
3 sst@paynefears.com  
4 Sarah J. Odia  
5 Nevada Bar No. 11053  
6 sjo@paynefears.com  
7 PAYNE & FEARS LLP  
8 6385 S. Rainbow Blvd., Suite 220  
9 Las Vegas, Nevada 89118  
10 Telephone: (702) 851-0300  
11 Facsimile: (702) 851-0315  
12 *Attorneys for Plaintiff Capitol*  
13 *Specialty Insurance Corporation*

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

11 CAPITOL SPECIALTY INSURANCE  
12 CORPORATION, a Wisconsin corporation,  
as assignee of UNITED CONSTRUCTION  
COMPANY.

**Plaintiff,**

V.

13 STEADFAST INSURANCE COMPANY, a  
14 Delaware corporation; RHP MECHANICAL  
15 SYSTEMS, a Nevada corporation; and AXIS  
16 SURPLUS INSURANCE COMPANY, an  
17 Illinois corporation,

## Defendants.

Case No.: 2:20-cv-1382-JCM-VCF

**SECOND REQUEST FOR AN  
EXTENSION OF TIME TO FILE A  
STIPULATION REGARDING  
STEADFAST'S MOTION FOR  
PROTECTIVE ORDER (ECF 109) AND  
[PROPOSED] ORDER**

PLAINTIFF Capitol Specialty Insurance Corporation (“CapSpecialty”) and Defendant STEADFAST INSURANCE COMPANY (“Steadfast”) (collectively “Parties”), by and through their respective attorneys of record, hereby request another one-week extension of the Court’s deadline for the Parties to reach an agreement regarding Steadfast’s Motion for Protective Order (ECF No. 109) pursuant to the Court’s August 19, 2022 Order (ECF No. 119). The Court ordered that the Parties file a stipulation by September 1, 2022, and the parties filed a Request for Extension of Time requesting additional time through September 9, 2022. However, the Parties

1 are still negotiating the terms of a potential stipulation and have not yet reached an agreement. The  
2 Parties, therefore, request an additional one-week extension, to September 16, 2022, to file a  
3 stipulation, to the extent that the parties are able to reach an agreement.

4 Dated: September 9, 2022

Dated: September 9, 2022

5 PAYNE & FEARS LLP

MORALES FIERRO & REEVES

7 By: /s/ Sarah J. Odia

8 Sarah J. Odia, Esq.  
9 Scott S. Thomas, Esq.  
9 6385 S. Rainbow Blvd, Suite 220  
10 Las Vegas, NV 89118  
(702) 851-0300

11 Attorneys for Plaintiff CAPITOL SPECIALTY  
12 INSURANCE CORPORATION

By: /s/ William C. Reeves

William C. Reeves, Esq.  
600 Tonopah Drive, Suite 300  
Las Vegas, NV 89106

13 Attorneys for Defendant STEADFAST  
14 INSURANCE COMPANY

**ORDER**

15 The Court having considered the request of the parties and good cause appearing, orders  
16 that PLAINTIFF Capitol Specialty Insurance Corporation and DEFENDANT Steadfast Insurance  
17 Company have until September 16, 2022 to file a stipulation to resolve Steadfast's Motion for  
18 Protective Order (ECF No. 109) to the extent that the parties are able to reach an agreement.

19 IT IS SO ORDERED.

20 DATED: 9-19-2022



23 UNITED STATES MAGISTRATE JUDGE

25 4890-1504-6706.1